

April 12, 2018

EEO Staff
Policy Division

Mr. Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: KGO(TV), Facility Id.#34470; San Francisco, California
Equal Employment Opportunity Program Audit Response

Dear Mr. Pulley,

We write on behalf of KGO Television, Inc., a wholly-owned subsidiary of ABC, Inc., licensee of KGO ("Licensee") in response to your letter dated February 26, 2018 regarding a random audit of the Equal Employment Opportunity ("EEO") program of KGO, in accordance with Section 73.2080 of the Federal Communication Commission's rules.

KGO is an equal opportunity employer. KGO's longstanding policy is to provide equal opportunity for all employees and applicants for employment without regard to race, religion, color, sex, sexual orientation, gender identity, national origin, age, marital status, covered veteran status, mental or physical disability, pregnancy, or any other basis prohibited by state or federal law.

We will address in order each applicable inquiry posed in your letter.

Question 3: Audit Data Requested.

KGO has one hundred forty-six (146) full-time employees.

Question 3(a): Annual EEO public file reports. Copies of KGO's two most recent annual EEO public file reports filed as of August 1, 2016 and August 1, 2017 pursuant to Section 73.2080(c)(6) of the Commission's rules are attached hereto as **Exhibit A**.

On the KGO website located at <http://abc7news.com>, the most recent EEO public file report can be found through the “KGO Job’s and Resources” page, <http://abc7news.com/jobs/>, with a direct link to the current Equal Employment Opportunity Report in the “Helpful Links” section of the page: <http://abc7news.com/careers/eo-report/25238/>

The dates of the ten (10) full-time hires listed in the EEO public file report filed on August 1, 2016 are:

July 27, 2015 (VP Broadcast and Digital Technology)
September 1, 2015 (Weekend Anchor/ Reporter)
October 5, 2015 (Weekend Anchor/ Reporter)
October 12, 2015 (Newsroom Coordinator)
November 9, 2015 (News Writer/ Producer - Union)
December 14, 2015 (Newscast Producer – Non-Union)
January 11, 2016 (Investigative Producer - Union)
March 28, 2016 (Sports Producer - Union)
April 1, 2016 (Coordinating Producer Integrated Content)
July 18, 2016 (Traffic Reporter).

The dates of the nine (9) full-time hires listed in the EEO public file report filed on August 1, 2017 are:

September 9, 2016 (Digital Producer)
September 26, 2016 (Vice President – Sales Manager)
December 19, 2016 (Digital Producer)
December 19, 2016 (Digital Producer)
January 17, 2017 (Executive Producer News)
January 19, 2017 (7 On Your Side Coordinator – Non-Union)
January 30, 2017 (Account Executive)
March 13, 2017 (Managing Editor, Multi-Platform News)
March 13, 2017 (General Assignment Reporter).

Question 3(b): Job announcements. The available documentation of job announcements (including copies of all available advertisements, letters, faxes, e-mails, or other communications announcing the position) for the nineteen (19) full-time positions filled during

the period covered by the two most recent annual EEO public file reports (August 1, 2016 through August 1, 2017) are attached hereto as **Exhibits B1 – B19**.

In compliance with EEO rules, KGO has widely publicized all full-time job vacancies throughout the reporting years, as detailed in the annual EEO public file reports attached as **Exhibit A**. Distribution of information about vacancies at KGO included postings on the KGO website, abc7news.com, on The Walt Disney Company website, disneycareers.com, industry sites such as tvjobs.com, tvandradijobs.com, and general notification sites like craigslist.com.

KGO also maintains a distribution/contact list of more than sixty (60) local community-based organizations and schools as noted in Attachment C of its annual EEO public file reports. KGO uses Broadcast1Source, a software service for EEO compliance, to send notices of available full-time positions to organizations on the Station's list. This list is updated periodically and includes media organizations with a broad-based membership of women and minorities like the National Association of Hispanic Journalists (NAHJ), the Native American Journalists Association (NAJA), and the Bay Area Black Journalists Association (BABJA)¹ as itemized in the annual EEO public file reports attached as **Exhibit A**.²

Question 3(c): Interviewees and referral sources.

The interviewees and referral sources for ten (10) full-time positions listed in the EEO public file report filed on August 1, 2016 are:

1. Eleven (11) candidates were interviewed for the Vice President of Broadcast and Digital Technology position (hired on July 27, 2015), and the referral sources listed for those interviewees were five (5) internal candidates, four (4) candidates from disneycareers.com; two (2) from careerbuilder.com. The person hired was an internal candidate (employed by ABC owned station KABC-Los Angeles);
2. Eleven (11) candidates were interviewed for the Weekend Anchor/ Reporter position (hired on September 1, 2015), and the referral sources listed for those interviews were eight (8) referrals from agents; one (1) internal candidate; one (1) referral from Talent Dynamics; and one (1) internal candidate from KABC. The person hired was referred by an agent.
3. Five (5) candidates were interviewed for the Weekend Anchor/ Reporter position (hired on October 5, 2015), and the referral sources listed for those interviews

¹ Due to an administrative error, the Bay Area Black Journalists Association was mistakenly listed as the "Bay Area Black Media Coalition" on the annual EEO public file reports. The name of the organization will be properly listed in a revised EEO report which will be placed in the Station's online public file and on its website.

² In the course of preparing its response to this Audit, the Station determined that some notification attempts sent by Broadcast1Source to certain organization on the Station's list were unsuccessful. The Station will post revised EEO Reports to the public file and on the station's website (for the 2017 report) that list only those organizations for which the Station has received confirmation from Broadcast1Source that notifications were successfully received. The Station will work to verify the correct and current contact information for the other organizations and determine whether they wish to remain on the Station's list to receive future notifications of job openings.

were four (4) referrals from agents and one (1) internal candidate. The person hired was referred by an agent.

4. Three (3) candidates were interviewed for the Newsroom Coordinator position (hired on October 12, 2015), and the referral sources listed for those interviews were: two (2) from disneycareers.com; one (1) internal candidate. The person hired was a disneycareers.com candidate.
5. Seven (7) candidates were interviewed for a Newscast Producer position (hired on October 21, 2015), and the referral sources listed for those interviews were: two (2) referrals from agents; one (1) industry referral; one (1) OTV (non-profit television incubator) referral; one (1) candidate from disneycareers.com; two (2) internal candidates. The person hired was referred by an agent.
6. Six (6) candidates were interviewed for a News Writer/ Producer position (hired on November 9, 2015), and the referral sources listed for those interviews were: two (2) internal candidates; one (1) agent referral; one (1) OTV referral; one (1) industry referral; one (1) disneycareers.com candidate; one (1) agent referral. The person hired was an internal candidate.
7. Three (3) candidates were interviewed for the Investigative Producer position (hired on January 11, 2016), and the referral sources listed for those interviews were: two (2) industry referrals; one (1) disneycareers.com candidate. The person hired was referred by an industry colleague.
8. Six (6) candidates were interviewed for the Sports Producer position (hired on March 28, 2016), and the referral sources listed for those interviews were: three (3) internal candidates; three (3) referrals from current employees. The person hired was referred by a current employee.
9. Ten (10) candidates were interviewed for the Coordinating Producer/ Integrated Content position (hired on April 1, 2016), and the referral sources listed for those interviews were: six (6) internal candidates; three (3) candidates from disneycareers.com; one (1) candidate referred by a current employee. The person hired was an internal candidate.
10. Seven (7) candidates were interviewed for the Traffic Reporter position (hired on July 18, 2016), and the referral sources listed for those interviews were: three (3) referrals from agents; two (2) internal candidate referrals; and two (2) referrals from Talent Dynamics. The person hired was a referral from Talent Dynamics.

The interviewees and referral sources for nine (9) full-time positions listed in the EEO public file report filed on August 1, 2017 are:

1. Ten (10) candidates were interviewed for the VP Sales Manager position (hired on September 26, 2016), and the referral sources listed for those interviews were: six (6) industry referrals; two (2) disneycareers.com candidates, and two (2) internal candidates. The person hired was an internal candidate.

2. Four (4) candidates were interviewed for the 7 On Your Side Coordinator position (hired on January 19, 2017), and the referral sources listed for those interviews were: three (3) disneycareers.com candidates; one (1) internal candidate. The person hired was a disneycareers.com candidate.
3. Five (5) candidates were interviewed for the Digital Producer position (hired September 9, 2016), and the referral sources for these interviews were: three (3) disneycareers.com candidates; one (1) internal candidate; one (1) employee referral. The person hired was a referral from a current employee.
4. Nine (9) candidates were interviewed for the Digital Producer position (hired on December 19, 2016), and the referral sources listed for those interviews were: five (5) disneycareers.com candidates, two (2) internal candidates, one (1) candidate referred by an employee, one (1) personal referral. The person hired was a candidate from disneycareers.com.
5. Nine (9) candidates were interviewed for the Digital Producer position (hired on December 19, 2016), and the referral sources listed for those interviews were: four (4) disneycareers.com candidates; two (2) internal candidates; two (2) referrals from employees; one (1) personal referral. The person hired was a candidate referred by an employee.
6. Four (4) candidates were interviewed for the Executive Producer – News position (hired on January 17, 2017), and the referral sources listed for those interviews were: two (2) disneycareers.com candidates, one (1) internal candidate; one (1) referral from an employee. The person hired was a candidate from disneycareers.com.
7. Nine (9) candidates were interviewed for the Account Executive position (hired on January 30, 2017), and the referral sources listed for those interviews were: seven (7) industry referrals; two (2) disneycareers.com candidates. The person hired was a referral from an industry colleague.
8. Eight (8) candidates were interviewed for the Managing Editor, Multi-Platform news position (hired on March 13, 2017), and the referral sources listed for those interviews were: six (6) candidates referred by a recruiter; one (1) disneycareers.com candidate; one (1) internal candidate. The person hired was a referral from a recruiter.
9. Five (5) candidates were interviewed for the General Assignment Reporter position (hired on March 13, 2017), and the referral sources listed for those interviews were: three (3) referrals from agents, one (1) industry referral; one (1) referral from a journalism conference.

Question 3(d): Documentation of recruitment initiatives. KGO currently has one hundred forty-six (146) full-time employees. KGO's city of license is San Francisco/ Oakland/ San Jose, California, and this market includes a metropolitan area with a population of 250,000

persons or more. Therefore, pursuant to Section 73.2080(c)(2) and (e)(3) of the Commission's rules, KGO is required to perform at least four (4) EEO initiatives within a two-year period.

During the 2016 and 2017 EEO public file reporting periods, the following recruitment initiatives were undertaken with available documentation attached hereto as **Exhibit C**:

1. Internship Program

KGO has an ongoing student internship program (paid up for 20 hours a week) open to college juniors and seniors enrolled in a four-year college or for students enrolled in a graduate school program. The students are assigned to specific units at KGO during the internships including News, 7 On Your Side, Sports, Research, Public Affairs, Programming, and Production Administration. During the reporting period, KGO had a total of thirty-three (33) interns from the following colleges and universities:

Eleven (11) students	San Francisco State University
Eight (8) students	University of California, Berkeley
Two (2) students	University of San Francisco
Two (2) students	Ithaca College
One (1) student	Sonoma State University
One (1) student	California Polytechnic State University
One (1) student	Point Loma Nazarene University
One (1) student	Santa Clara University
One (1) student	Academy of Art University
One (1) student	Ex'pression College for Digital Arts
One (1) student	Academy of Art University
One (1) student	The George Washington University

2. Job Fairs and Diversity Conferences

During the reporting period, KGO partnered with the California Job Journal, a resource for job seekers, and HireEvents, a division of the California Job Journal that produces numerous job fairs throughout California. In addition to general job fairs, HireEvents holds fairs that focus on specific demographics including, minorities, women, youth, and the disabled. KGO also worked with the City College of San Francisco (CCSF) which hosts job fairs available to the general public. Members of KGO also attended Diversity Conferences in an effort to meet additional candidates from diverse backgrounds interested in pursuing careers in broadcast journalism. The Station participated in the following job fairs and conferences during the reporting period:

August 12-15, 2015 -- Tracey Watkowski, VP/ News Director, attended the Asian American Journalists Association (AAJA) Regional Conference in San Francisco, CA.

September 23, 2015 -- Bradley Hoffman, Human Resources Manager, attended the 21st Annual Diversity Job Fair for Bay Area Counties in San Francisco, CA.

April 21, 2016 -- Bradley Hoffman attended the 22nd Annual Diversity Job Fair for Bay Area Counties in San Francisco

August 3, 2016 -- Stephanie Linton Kovaleski, Assistant News Director, attended the National Association of Black Journalists (NABJ) National Conference in Washington, DC.

October 5, 2016 -- Bradley Hoffman attended the CCSF Job Fair for Bay Area Counties.

April 12, 2017 – Lilian Pena, Account Executive, was a guest speaker for National Association of Hispanic Journalists at San Francisco State University's "Career Options in Broadcasting" event.

May 4, 2017 – Bradley Hoffman attended the CCSF Mission Center Job Fair for Bay Area Counties.

July 26, 2017 – Bradley Hoffman attended the Hire Live Job Fair at the San Francisco Marriott Marquis in San Francisco.

3. Employee Job Training

During the reporting period, KGO sent several employees for training sessions to help them develop skills that could assist in advancing their careers and help qualify them for higher positions. Some of the sessions included:

July 23-24 2016 – Four (4) employees – Jannell Harris, Mollie Wagner, Daniel Kreiter, and Katie Nestor - attended a training session at the Bay Area Video Coalition using the Adobe Editing System for graphics and art.

November 6, 2016 – Three (3) employees – Jannell Harris, Mollie Harris, and Dan Kreiter – attended a training session at the Bay Area Video Coalition to develop their skills in Audio Post Production.³

³ The 2017 Annual EEO Report omitted this training session among the sessions that it noted.

October 21, 2016; December 2, 2016; December 9, 2017 – two (2) employees⁴ – Janell Harris, and Dan Kreiter attended training at the Bay Area Video Coalition for Social Media Campaign Strategies, Online and Social Media Analytics, and Social Media Marketing.

4. Educational Outreach Programs

July 2016 & 2017 -- Mimi Kwan and Laura Kutch, Manager, Community Affairs orchestrated the **ABC7 Star Scholars** program recognizing the Bay Area's top high school academic achievers. Each year, the program awarded \$1,000 to seven local graduating high school seniors heading for college. The profiles of the student winners are featured in ABC7 newscasts as well as in a special half-hour program. To qualify, these outstanding students exhibited exemplary skills in presentation, writing, and leadership. The overall purpose of this program serves as an outreach vehicle to promote and reward academic excellence in the educational community and expose students to the broadcast industry.

Since 2007, KGO-TV has sponsored **The Pete Wilson Journalism Scholarship** that is administered and awarded annually by The Radio and Television Digital News Foundation (RTDNF). Mr. Wilson was a news anchor at KGO-TV. The endowment provides an annual \$2000 journalism scholarship in Pete Wilson's name. Applicants for this endowed scholarship award must be from the San Francisco Bay area or studying in the Bay area in pursuit of a degree in journalism. The 2015 Scholarship was awarded to Max Darrow from Menlo Park, CA. The 2016 Scholarship was awarded to Danielle Decker of San Francisco, CA.

During the reporting period, KGO Staff provided tours for students visiting from various schools and academic institutions in the San Francisco Bay Area. Students were able to watch a live 5PM newscast, tour the newsroom and finish with a question and answer session with other newsroom staff to provide them insight into the possibilities of a career in broadcast journalism. KGO personnel also participated in other events such as career days and school visits, workshops, and conferences sponsored by educational institutions in the community.

- a.) 10/29/15 – Todd Farber, VP/ General Sales Manager, hosted at Menlo College marketing students at KGO;
- b.) 11/11/15 – Cheryl Jennings, Anchor, hosted UC Berkeley from the Student Achievement Guided by Experience Program for a mentoring session at KGO;

⁴ Due to an administrative error, the 2017 Annual EEO Report listed the incorrect number of employees and some of the dates of these sessions. That information will be corrected in a revised EEO report which will be placed in the Station's online public file and on its website.

- c.) 11/17/15 – Cheryl Jennings hosted students from Academy of Art University at KGO;
- d.) 01/11/16 - Spencer Christian, Weather, guest lectured on the water cycle for second grade students at the RLS School;
- e.) 01/29/16 - Kristen Sze, Anchor, hosted 8th Grade students from the Nueva School at KGO;
- f.) 02/06/16 – Jerry Sandy, Director, hosted BYU Broadcasting students at KGO;
- g.) 02/16/16 – Mike Mitchell, Editor, hosted the SFSU News Crew at KGO;
- h.) 02/23/16 – Sandhya Patel spoke at a Career Day at Monticello Academy;
- i.) 03/11/16 – Sandhya Patel, Meteorologist, spoke at a Career Day at Redwood Shores Elementary School;
- j.) 03/14/16 – Mimi Kwan, VP Community Affairs, hosted students from Lynbrook High School during a Job Shadow day at KGO;
- k.) 03/15/16 – Dan Ashley, Anchor, hosted journalism students from University of North Carolina at Chapel Hill;
- l.) 03/15/16 – Lilian Pena, Account Executive, participated in a Career Day at Mission High School;
- m.) 03/29/16 – Michael Finney, Consumer Affairs Correspondent, participated in a CSU Chico Alumni Association event about negotiating for large purchases;
- n.) 04/06/16 – Lilian Pena hosted broadcast Journalism students from Laney College;
- o.) 04/22/16 – Mimi Kwan hosted media studies students from UC Berkeley at KGO;
- p.) 05/10/16 – Lilian Pena participated in a career day at Mission High;
- q.) 05/14/16 – Lilian Pena participated in a mentoring program at Santa Clara University for the Congressional Hispanic Caucus Institute;
- r.) 10/7/16 – Kristen Sze spoke at SFSU College of Business Women's Emerging Leadership Forum;

- s.) 10/31/16 – Lilian Pena hosted multimedia students from Laney College at KGO;
- t.) 12/01/16 – Mimi Kwan hosted broadcast students from De Anza College Cupertino;
- u.) 12/02/16 – Mimi Kwan hosted the Video Club from Hult International Business School at KGO;
- v.) 01/12/17 – Kristen Sze hosted Journalism and Visual Communication students from Keimyung University, Korea at KGO;
- w.) 01/18/17 – Kristen Sze hosted School of Communication and Journalism students from Shanton University;
- x.) 01/19/17 – Kristen Sze hosted students from SMIC School, Shanghai, at KGO;
- y.) 04/05/17 – Cheryl Jennings hosted the UC Berkeley Daily Cal newspaper staff at KGO;
- z.) 05/01/17 – Mimi Kwan hosted students from the UC Berkeley Careers in TV Entertainment Club at KGO;

5. Listing of Upper Level Openings

KGO used the services of Broadcast1Source to send notices of available full-time positions to organizations on the Station's contact list that includes media trade organizations that have a broad-based membership that includes women and minorities as noted in EEO Reports during the reporting period.⁵

Bay Area Black Journalists Association⁶
 National Association of Hispanic Journalists
 Native American Journalist Association

⁵ Due to an administrative error, the Station listed several additional organizations for this aspect of their recruitment initiatives on their annual EEO public file reports, but it did not properly add those organizations to its default list with Broadcast1Source to ensure notification efforts were made with those organizations. The relevant organizations – American Women in Radio and Television, California Chicano News Media Association, National Association of Black Journalists, The Association for Women in Communications -- will be removed in revised EEO reports which will be placed in the station's online public file and on its website (for the 2017 report). KGO will notify Broadcast1Source to include those organizations as part of its future notification efforts on behalf of the Station.

⁶ See supra footnote 1.

Question 3(e): EEO complaints during current license term. During the license term, there were two complaints by employees against the Station involving allegations of discrimination and harassment.

Complaint One:

- 1) Heather Rogers, a former on-air reporter for KGO alleged disability and gender discrimination, retaliation, and harassment. She also alleged that KGO caused her to have a subarachnoid hemorrhage.
- 2) The matter was *Heather Ishimaru Rogers and Brian Rogers v. KGO Television, Inc., Tracey Watkowski, and DOES 1- 100, inclusive*.
- 3) The complaint was filed November 23, 2015.
- 4) The venue was the San Francisco County Superior Court.
- 5) The case number was CGC-15-549102.
- 6) The parties settled at a Mandatory Settlement Conference held on September 8, 2017 and the case was dismissed on December 1, 2017.

Complaint Two:

- 1) Alan Wang, a former KGO reporter, was terminated in March 2016 for tweeting offensive comments. Following his termination, he asserted claims of race discrimination, disability discrimination, and harassment.
- 2) The matter was *Alan Wang v. ABC7/ KGO-TV/ Disney*
- 3) The complaint was filed April 8, 2016.
- 4) The adjudicating agency was the California Department of Fair Employment and Housing.
- 5) The charge number was 751651-216528.
- 6) The matter was resolved on June 22, 2016 through a private mediation.

Question 3(f): EEO enforcement policies and responsibilities. In accordance with Section 73.2080(b) of the Commission's rules, the Licensee, together with its parent and affiliated companies ABC, Inc. and The Walt Disney Company, is an equal opportunity employer committed to maintaining a strong policy and practice of prohibiting discrimination. The responsibility for maintaining this policy and practice rests primarily with the management of the Licensee, including the President and General Manager of KGO, the Vice President of Operations and Business Planning, and Department Heads responsible for hiring and promotion. However, all employees of the Licensee are expected to be aware of its EEO policy and assist in effectively maintaining it. The methods by which the Licensee's EEO policies and practices are communicated, implemented, reviewed and, if necessary, revised are as follows:

1. The Walt Disney Company maintains a strong equal employment opportunity policy, included in the Employee Policy Manual, which is available to all full-

time employees on the company's online portal www.inside.disney.com, and is attached hereto as **Exhibit D**. A copy of the Equal Employment Opportunity Policy is made available to all KGO employees at their new employee orientation and is contained in relevant excerpts from the Employee Policy Manual attached hereto as **Exhibit E**. All employees of The Walt Disney Company are also expected to be familiar with the company's Standards of Business Conduct, which contains a commitment to diversity and to a work environment that is free of discrimination and sexual harassment. A copy of the Standards of Business Conduct is made available to all KGO employees at their time of hire, and is attached hereto as **Exhibit F**. The file for each KGO employee contains a signed acknowledgement that they have read and understood the Standards of Business Conduct, a sample of which is attached as **Exhibit G**. In addition, all full-time employees of The Walt Disney Company are required to complete periodic on-line Compliance Training, which includes business conduct, harassment and fair employment practices training.

2. ABC, Inc. distributes a Harassment Policy document to all KGO employees at their time of hire. A copy of the Harassment Policy document and as contained in the related excerpt from the Employee Policy Manual is attached hereto as **Exhibit H**. The policy establishes a complaint process for employees to follow if they believe that they have been subject to discrimination, a copy of which is attached as **Exhibit I**. All complaints are promptly reviewed and investigated by trained professionals from the Disney ABC Television Group Human Resources Department and/or ABC, Inc. Legal Department. ABC, Inc. requires all stations to post information regarding EEO, harassment and complaints policies in a common area near their already required Federal and State labor law posters.
3. The ABC Media Networks Human Resource Department and the ABC Law & Regulation Department have given presentations, sent memos and conducted conference calls with managers and other station employees explaining the Commission's EEO rules and emphasizing the importance of strict compliance with them. The Legal Department works closely with KGO management and personnel on an ongoing basis to address any questions and to facilitate and improve compliance.
4. The President and General Manager of KGO, along with the Vice-President of Operations and Business Planning, and the Human Resources Manager, have the primary responsibility for implementing, monitoring and improving compliance with company EEO policies and those of the Commission. They also act as a liaison to the community at large and help to ensure that KGO's job openings are disseminated widely. KGO station management reviews resumes and schedules interviews, sometimes in conjunction with the station's Disney ABC Television Group Human Resources recruiting representative. They are also responsible for making the following efforts to implement and improve compliance with EEO policies:

- Oversee the implementation and updating of KGO outreach/recruitment initiatives, which are detailed in the foregoing responses and in the annual EEO public file reports;
- Recruit widely for all job openings;
- Evaluate the effectiveness of programs and procedures;
- Order the scheduling of on-air announcements pertaining to EEO outreach;
- Maintain and update KGO's community organizations mailing list; and
- Maintain documentation required by the Commission's rules.

Question 3(g): EEO recruitment program review and analysis. In accordance with Section 73.2080(c)(3) of the Commission's rules, KGO station personnel are responsible for engaging in an ongoing effort to analyze its EEO recruitment program and to ensure its effectiveness. To this end:

1. KGO managers periodically reviewed contacts on its community organizations mailing list for accuracy.
2. KGO managers reviewed the Applicant Flow Logs from any full-time positions hired to verify that applicants are coming from a variety of sources.
3. From August 1, 2015 through August 1, 2017, KGO broadcast Two Hundred and Four (204)⁷ on-air EEO announcements on KGO's primary channel (D1) and Two Hundred and Forty-Eight (248) announcements on KGO's secondary channel (D2) with information for organizations on how to receive notification of future vacancies at KGO by being added to its contact list. The dates and times of the announcements are attached hereto as **Exhibit J**.
4. Additionally, the Director of Operations and Business Planning and the Community Affairs and Programming Director have assumed implementation and monitoring responsibilities, which include:
 - Developing the policy statements and affirmative action programs;
 - Developing internal and external communication procedures, as appropriate;
 - Designing and maintaining an internal audit and reporting system that will identify any areas requiring remedial action and develop programs to correct those problem areas and determine the degree to which the goals and objectives have been reached.

⁷ The Station's Annual Report for 2016 slightly underreported the number of announcements broadcast on D1. The correct number was 202, not 197, and that change will be reflected on a revised EEO revised uploaded to the Station's public file.

- Monitoring the following internal practices:
 - Proper display of EEO posters and policies; and
 - Full participation of minority, female, and disabled employees in all KGO sponsored educational, training, recreational, and social activities;
- Assisting management in solving any identified problems.
- Keeping management informed of the latest developments in the equal employment opportunity area;
- Assisting employees in solving problems and resolving EEO complaints;
- Serving as a liaison between KGO and appropriate women and minority advocacy groups;
- Serving as a liaison between KGO and appropriate EEO enforcement agencies;
- Participating in and/or supporting local minority organizations, women's organizations, community action groups and community service programs;

Question 3(h): Efforts to analyze hiring and promotion. The KGO President and General Manager and KGO personnel are aware that all hiring, promotion, pay and benefits are to be conducted in a manner that is free of improper discrimination of any kind. The importance of equal employment opportunity is reinforced in training periodically conducted by ABC, Inc.'s Legal Department, which explains the company's equal opportunity policies. The KGO President and General Manager and Manager of Human Resource Services also periodically consult with the ABC, Inc.'s Legal Department on a case-by-case basis regarding equal employment opportunity questions and issues. As for the specific issues of pay, benefits, promotions and selection techniques:

1. **Compensation and Benefits:** The President and General Manager, Manager of Human Resource Services and Department Heads determine the salary requirement for each open position, prior to a job offer being made. In addition, once per year, the President and General Manager and the Vice-President of Operations and Business Planning, review all salaries to make sure no person or group is out of line with station and market salaries. Moreover, the same group of individuals discusses the job responsibilities, scope of work and specific knowledge and skills needed to perform any job before annual merit increases, promotions or bonuses are issued in order to ensure proper compensation and promotion practices are being followed. All Benefit plans are reviewed, communicated and executed by The Walt Disney Company's Corporate Benefits Department and are presented annually to all employees. Information is readily available to all employees via the corporate intranet site. In addition, there is related electronic and mail communication distributed to all employees.

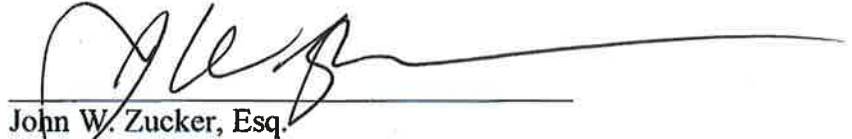
2. **Promotions:** All job openings are posted internally for a minimum of two weeks to allow current employees the opportunity to apply for any open positions throughout the company. Internal candidates are considered for promotion whenever possible. All internal promotions are reviewed by Disney ABC Television Group Human Resources and Corporate Compensation.
3. **Selection Techniques:** Once a full-time position becomes available, the following preliminary process is enacted:
 - a. Internal Job Posting is completed which includes job requirements and compensation. It is reviewed and approved by local and senior management, Disney ABC Television Group Human Resources, Corporate Compensation and Corporate Finance.
 - b. Applicants are reviewed by Disney ABC Television Group Human Resources as well as local and senior management. Applicants are selected based on academics, experience and skill level. Interviews of selected applicants are conducted by KGO's President and General Manager, and/or Department Heads.
 - c. An Applicant Flow Log is maintained for all positions including the names, ethnicity and gender and referral sources of all interviewed applicants.
4. **Tests:** Criminal background checks are conducted by a third-party vendor on all part-time and full-time applicants.

Question 3(i): Religious broadcaster. KGO is not a religious broadcaster.

Question 4: Time Brokerages. KGO has not entered into any time brokerage agreements.

Please contact the undersigned if you have any further questions or if you would like the Licensee to provide any additional information or materials.

Respectfully submitted,



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cc: KGO (TV) Online Public Inspection File

DECLARATION

KGO (TV) (ID # 34470); San Francisco/Oakland/San Jose, CA
Response to FCC Audit of Station's Equal Employment Opportunity Program

I, John W. Zucker, Assistant Secretary of ABC, Inc., licensee of the above referenced station, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief, based upon information that has been provided to me.



Signature

4/12/2018
Date